

Limor Lehavi (SBN 189054)
llehavi@lslawoffices.com
LEHAVI STARGARDTER, LLP
P.O. Box 5973
Orange, CA 92863
T: (949) 570-9575
F: (949) 570-9580

Attorneys for Defendants
United National Insurance Company; McCord &
Associates, Inc.; and Curtis Schulz

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

S & J LOGISTICS, INC.; and SUKHVIR
SINGH,

Plaintiffs,

v.

UNITED NATIONAL INSURANCE
COMPANY; CONTINENTAL TRUCKING
ASSOCIATIONS; TRINITY UNDERWRITERS,
LLC; McCORD & ASSOCIATES; CURTIS
SCHULZ; and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 1:22-CV-00109-JLT-BAK (BAM)

**APPLICATION AND ORDER TO EXTEND
TIME FOR DEFENDANT UNITED
NATIONAL INSURANCE COMPANY TO
RESPOND TO FIRST AMENDED
COMPLAINT**

Complaint served: January 19, 2022
Current Response date: March 15, 2022
New Response: April 8, 2022

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

On February 12, 2022, Plaintiffs S&J Logistics, Inc. and Sukhvir Singh and Defendants United National Insurance Company (“United National”), McCord & Associates (“McCord”), and Curtis Schulz (“Schulz”) (collectively “Defendants”) filed a stipulation pursuant to Eastern District Local Rule 144(a), stating that Defendants may have up to and including March 8, 2022, to file an answer or otherwise respond to the complaint. That was the first extension of time in this case and extended the time to file by 28 days.

Following the stipulation and the parties’ fruitful meet and confer, Plaintiffs filed a First Amended Complaint (“FAC”) on March 1, 2022, and voluntarily dismissed McCord and Schultz, added a cause of action, and removed two causes of action, thus narrowing the issues to be determined in this litigation.

United National's response to the FAC is currently due March 15, 2022. The two remaining additional defendants have yet to appear in this matter.

To enable the parties to further and meet and confer regarding the FAC, the parties now seek the Court's approval to stipulate that United National may have up to and including April 8, 2022, to file an answer or otherwise respond to the FAC. This is the second extension of time in this case.

United National seeks this extension because it intends to file a motion under Rule 12b(6) and the complexity of the issues is such that defense counsel has not been able to complete its motion under the original two-week extension and will need additional time to do so. The additional time is additionally justified because the defense attorney working on this matter has encountered several short-term legal emergencies on other engagements that have prevented her from devoting full time to the preparing of the initial motion here. Plaintiffs do not object to United National's request for a second extension.

IT IS SO STIPULATED.

Dated: March 9, 2022

LEHAVI STARGARDTER, LLP

By: /s/ Limor Lehavi

Limor Lehavi
Attorneys for Defendants
United National Insurance Company

Dated: March 9, 2022

SSD LAW FIRM P.C.

By: /s/ Sarwinder Dhanjan

Sarwinder Dhanjan
Attorneys for Plaintiffs
S&J Logistics, Inc. and Sukhvir Singh

SIGNATURE ATTESTATION

I, Limor Lehavi, am the ECF user whose ID and password are being used to file the above documents. I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: March 9, 2022

LEHAVI STARGARDTER, LLP

/s/ :Limor Lehavi

Limor Lehavi

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ORDER

Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY ORDERED, that Defendant United National Insurance Company shall have an extension of time, to and include April 8, 2022, in which to respond to Plaintiff's First Amended Complaint.

IT IS SO ORDERED.

Dated: March 10, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE